

process would be used in those cases where the end user became eligible for the Lifeline program while subscribed to a reseller's service.

76. By contrast, if a new Lifeline customer established service with a reseller, a different procedure would apply. In this case, a reseller would be responsible for qualifying the customer for Lifeline eligibility; Ameritech would not be involved in that process. Once that qualification process were completed by a reseller, a reseller would send the order to Ameritech and Ameritech would enter the appropriate information onto the customer's account information. The order would pass through Ameritech's service ordering system, the monthly credit would be applied to a reseller's bill and a reseller would be responsible for passing the monthly credit to the end user.

77. Telecommunications Relay Service - Telecommunications Relay Service provides speech impaired and non-speech impaired individuals with a means to communicate with one another over the telephone. Operators are equipped with a voice-line and a Telecommunications Device for the Deaf (TDD), and relay message on-line between two parties. A hearing impaired person calling a party without a TDD typically dials an 800 number to reach a relay center. The relay center then places a voice call to the intended party. An operator will then facilitate a conversation between the two parties. The process can operate in reverse, as well, with the non-hearing impaired person calling the hearing impaired person. Any customer, regardless of local service provider, may access this service.

K. PROCESSES/TRANSACTIONS WHICH REQUIRE MANUAL INTERFACE

78. In two limited circumstances, a transaction may not flow through an operations support system electronically and may require human intervention. The first cause is incorrect or incomplete submission to Ameritech. Complete and accurate submissions will permit electronic flow-through. The second cause for manual intervention is the type or complexity of the order received. This cause is therefore not based on an error, nor does it adversely impact the CLEC.

79. Incorrect or Incomplete Order: The use of mechanized interfaces requires that the CLEC accurately provide all information necessary to place an order, since this information will automatically be transferred to downstream systems and personnel working the order. Correct submission of the order assures that the CLEC's and Ameritech's databases will match. If information is incomplete or inaccurate, the mechanized system will automatically return the order with an explanation of the error to the CLEC. The CLEC then corrects the errors and resubmits the order. Uncorrected, these orders might require downstream manual intervention, impact other customer services, and possibly require redesign by the CLEC. Returning incorrect orders to the CLEC, so that it can resolve the discrepancy at the order stage, also minimizes the need for manual interventions by both Ameritech and the CLEC on future orders.

80. Therefore, Ameritech's OSS contain certain order entry edits. These edits, designed to ensure that all data required to

process and fulfill an order is complete and accurate, are of two varieties.

81. First, it is assumed that the electronic interfaces used by a CLEC to submit an order run a complete series of input edit checks, to insure that the order includes all data critical to processing and fulfillment. The permissible entries in each service order field are identified in the TCIF Customer Service Guidelines, Issue 5, to which Ameritech currently refers CLECs who elect to use the electronic ordering interfaces. This specification is further supplemented in Ameritech's Electronic Service Ordering Guidelines. This manual is provided to CLECs by Ameritech.

82. Second, after passing through the electronic interfaces, the order flows into front-end systems that compare the data provided in the order to a table of permitted values (e.g., the USOC codes of Ameritech's available services), to insure that further processing of the order proceeds smoothly, as well as to eliminate discrepancies between the CLECs records and those of Ameritech.

83. Either of these types of edits may flag an order for return to the originator for correction of the error or omission. The order in question is returned to the originator for correction or completion when the error is detected by the system. The types of edits that would cause an order to be returned for data correction include: EDI syntax violation; EDI standard data element usage violation; required order heading information missing or invalid (e.g., due date, service address); inconsistent

combination of activity codes (e.g., addition of a line on a disconnect order); invalid feature USOC(s); invalid data value (e.g., PIC, Yellow Page Heading); duplicate order number; telephone number not served by Ameritech; missing data required by requested feature (e.g., referral of calls w/o referral number)

84. Order Content or Complexity: Certain types of orders necessarily require manual intervention by virtue of their content or complexity. An example is an order submitted by a CLEC for a subset of the lines in an existing Ameritech account, including the listed number of the account. In this situation, the account would have to be split and a new account established for the lines remaining with Ameritech. Likewise, an order may require intervention due to the uniqueness of the services needed to be provisioned and configured to fulfill the order. Other edits for manual intervention due to service type include: Centrex, private lines, listing changes, system database unavailable, manual due date assignment required, split of existing Ameritech account, and pending order(s) existing against account. In addition, orders carrying entries in any "remarks" files are always flagged for manual processing, in order to determine the effect of the entry on further processing. When an order of this type is identified, it is electronically forwarded to a service representative for review and, if necessary, modification of the information in the service order system.

85. At this point in the ordering process manual intervention does not affect the CLEC because during the pre-ordering process they have already received information, such as

the telephone number and a committed due date, needed to assure the CLEC that the order will be completed as submitted.

86. Other types of orders may require manual handling for facility assignment or some other step in the service provisioning process. For example, on orders for certain high-capacity data services, there is a need to determine whether the transmission quality of the specific loop facility chosen to fulfill the order is of sufficient quality to provide the service required. Such process-based screens for manual intervention apply in identical fashion to orders received from CLECs and from Ameritech's retail operations.

87. Ameritech will continue its ongoing efforts to improve the proportion of orders that flow through its systems without manual intervention because these efforts reduce the significant expenditures needed to support manual order processing orders. Current candidates for additional mechanization effort include: assumption of partial accounts, new activity of existing accounts, simple private lines, line additions to existing Centrex, simple listing changes, and related orders. Additional types of orders to be targeted in the future as candidates for fully-mechanized flow-through will be determined by reviewing the results of orders submitted, and by analyzing these results to identify those order types which make up the largest percentage of effort required to process all orders submitted. In addition, Ameritech will continue to work with its customers to identify the types of orders for which customers would benefit from additional mechanization effort.

88. Ameritech provides to carriers requesting access to OSS functions additional information regarding the interfaces utilized by Ameritech. This information regarding interface standards used by Ameritech permits requesting carriers to develop and maintain their own systems and procedures to make effective use of the interfaces.

89. All of these interfaces are consistent with all applicable industry standards as they exist today. As industry standards evolve, Ameritech will continue to review the changes in technology, consult with its customers, and enhance its interfaces or the underlying systems as necessary. For example, Ameritech has provided requesting carriers with its interface standards and specifications, product lists, USOC tables, sample data from the SAG, available features and functions, and a variety of other information relating to the interfaces. Ameritech has also shared its comprehensive EDI guidelines with AT&T and all other resale/wholesale carriers. Those guidelines detail the transaction sets for pre-ordering and ordering functions, including customer service record retrieval, address validation, and feature availability verification.

90. Ameritech has sought to ensure that these interfaces are usable in an effective and efficient manner by competing carriers. Ameritech provides a test facility for both its ordering and repair interfaces, and provides test data of the type that would be generated from its billing interfaces. The Company is in the process of developing a test facility for the pre-ordering interface. In addition, members of my AIIS team have already

spent considerable time in informal training sessions with AT&T and many other carriers with respect to the use of these interfaces. AIIS will continue to do so with AT&T and other carriers. Ameritech also provides the carriers with extensive training on order creation and the interpretation of customer service records. This training, when combined with interface training and data identified above, provides the carrier sufficient information to determine how to integrate Ameritech's pre-ordering, provisioning, maintenance/repair, and billing processes into the carrier's business processes. The interface specifications then provide the information needed by the carrier to develop the interface required to facilitate their business process.

91. These interfaces provide equivalent access to the same OSS functions that are used by Ameritech customer contact personnel. They assure that the availability, accuracy, and timeliness of information provided to requesting carriers is equivalent to that available to Ameritech.

92. In addition, Ameritech accepts orders for resale, access to unbundled network elements, and interconnection through a manual process, such as fax transmission. Ameritech will continue to do so, at least for a limited period of time and for limited volumes.

93. I have every reason to believe that these interfaces are capable of providing other carriers with access to Ameritech's OSS system functions that is equivalent to what the Company enjoys. And Ameritech stands ready to assist other carriers in resolving

any difficulty they encounter when accessing these OSS functions because of problems in their operations.

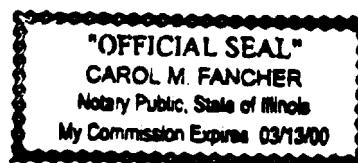
CONCLUSION

94. Based on my experience in performance measurement, Ameritech's agreements with Brooks, TCG, and AT&T give competing carriers an excellent way to compare the quality of performance they receive from Ameritech with the quality of performance Ameritech enjoys. The benchmarks are the appropriate criteria to measure. In the case of resale and some network elements, the benchmarks are the same criteria that Ameritech currently measures for the purpose of tracking the quality of the services we provide to our own retail customers. These benchmarks are an appropriate means by which to demonstrate Ameritech's continuing compliance with the FCC's requirements of equivalent access to OSS functions by requesting telecommunications carriers. In addition, Ameritech provides sufficiently detailed information regarding its electronic interfaces and their use of industry standards to enable carriers requesting access to Ameritech's OSS functions to develop and maintain their own systems and procedures to effectively use those standards and interfaces.


WARREN L. NICKENS

Subscribed and sworn to before me
this 16th day of December, 1996.





**REBUTTAL TESTIMONY OF GREGORY J. DUNNY
ON BEHALF OF AMERITECH ILLINOIS**

Q. Please state your name and business address.

**A. My name is Gregory J. Dunny. My business address is 350 North
Orleans, Chicago, Illinois 60654.**

Q. Have you previously submitted testimony in this proceeding?

A. Yes. I have submitted direct testimony in this proceeding.

Q. What is the purpose of your testimony?

**A. Its purpose is to respond to the contentions of various parties relative to
whether Ameritech Illinois is providing or generally offering
interconnection; unbundled local switching; access to 911/E911 services;
directory assistance and operator call completion; and interim and long
term number portability in a manner that satisfies the Section 271(c)(2)(B)
Competitive Checklist. Together with my direct testimony, I demonstrate**

that the Ameritech Illinois' interconnection, network elements, and other services I describe meet the checklist requirements of the Act.

Q. Does your testimony address any of the other checklist requirements?

A. Only in the most general way. Where my testimony does not address a particular requirement substantively, I point to where it is addressed in other Ameritech Illinois rebuttal testimony. In this way, my rebuttal testimony provides a kind of "road map" as to where the reader can find Ameritech Illinois' responses. To make the process of finding these responses easier, I have discussed checklist requirements in the same order that they appear in Section 271(c)(2)(B).

Q. Have any of the issues raised by the parties also appeared in the arbitration proceedings initiated by those parties?

A. Yes they have, and my testimony notes where this is the case. Since the Commission will resolve these issues in the arbitrations, there is absolutely no need to revisit them here. Nonetheless, for the convenience of the Commission, I summarize Ameritech Illinois' position in response to each of the arbitration issues that have been raised by the parties.

I. INTERCONNECTION

Q. Has Ameritech Illinois satisfied the checklist requirements for interconnection, including collocation, set forth in Section 271(c)(2)(B)(i) of the Act?

A. Yes it has. As described more fully in my direct testimony, Ameritech Illinois offers interconnection to requesting telecommunications carriers at all required points in accordance with Section 51.305 of the FCC's rules for the transmission and routing of telephone exchange traffic, exchange access traffic, or both. In addition, in accordance with Section 251(c)(6), Ameritech Illinois offers physical collocation on its premises of carrier-owned equipment necessary for interconnection with Ameritech Illinois' network. Ameritech Illinois also offers virtual collocation where technically feasible.

A. Points of Interconnection

Q. Sprint (Reeves, pp. 8-11) claims that Ameritech Illinois should be required to implement any form of interconnection and trunking arrangement that

meets only the most narrow standard of technical feasibility. This issue is also addressed by AT&T witness Falcone. (Falcone, pp. 6-7). What is Ameritech Illinois' response to this assertion?

A. The interconnection of networks is a complex matter which involves factors such as the potential effects on network reliability, service quality, cost, the establishing of commercially reasonable business arrangements, and impacts on carriers other than the two involved in the immediate negotiations. Ameritech Illinois believes that the interconnection arrangements it proposes reflect a reasonable accommodation of all of the important factors. However, if Sprint, AT&T or any other carrier wants to establish other interconnection arrangements, those carriers are able to request them through the BFR process and, if they are technically feasible, they will be provided based upon the costs involved.

Q. Sprint witness Betty Reeves complains that Sprint wants to interconnect at a Single Point of Interconnection ("POI") per LATA, while Ameritech Illinois is requiring Sprint to interconnect at each tandem in a LATA. (Reeves, p. 9). Please respond.

A. First, I would point out that this issue is currently subject to arbitration with Sprint in Illinois. Second, Ameritech Illinois is not opposed to the single

POI concept for physical collocation; in fact, this is similar to what Ameritech Illinois has agreed to with other requesting carriers. However, Ameritech Illinois proposes that Sprint or any other connecting carrier establish logical trunking (i.e., separate trunk groups carried over the same fiber-meet arrangement at the single POI) to each tandem in a LATA. If the traffic volume between any two central office switches at some future time exceeds the CCS busy hour equivalent of one DS1, Ameritech Illinois proposes that a separate direct (non-tandem) trunk group, carried over the single POI interconnection facilities, shall be established between the two central office switches.

Q. Why is the logical trunking proposal important to Ameritech Illinois?

A. Ameritech Illinois desires to offer the most efficient and reliable network possible to all requesting carriers. The trunking arrangements proposed by Ameritech Illinois for its interconnection with Sprint are the same types of arrangements Ameritech Illinois uses to interconnect its own switches. These arrangements are designed to provide the most robust and cost-efficient network possible.

On the other hand, if logical trunking is not established per Ameritech Illinois' proposal, some tandems could exhaust capacity, resulting in the

blocking of all carriers' calls. In addition, concentrating all traffic between two carriers on a single trunk group at a single tandem would establish a single point of potential network failure for which no alternative route would be available. This would jeopardize the service that Ameritech Illinois provides to other carriers, their end users, and Ameritech Illinois' own end users.

Moreover, the trunking arrangement proposed by Sprint would also adversely affect the cost of transport and termination of calls. Both the TELRIC studies performed by Ameritech and the cost proxies established by the FCC are based on the assumption that a call will be switched through only a single tandem before terminating at an end office. Sprint's proposed single trunk group arrangement per LATA would result in many calls being switched through two tandems, and it would be necessary to account for this increased cost in the reciprocal compensation rates for Sprint.

B. Jurisdictional Trunks

- Q. Both Sprint and AT&T witnesses specifically complain that they should be permitted to utilize non-jurisdictional trunk groups, where local, intraLATA and interLATA traffic are mixed. (Reeves, pp. 10-12; Falcone, p. 6).
Please respond.

- A. This is another issue that is currently being arbitrated by Sprint and will therefore be resolved through that process. Further, I would note that AT&T has accepted Ameritech Illinois' trunking proposal in the parties' interconnection agreement. This being said, I will summarize Ameritech Illinois' position.

Ameritech Illinois has proposed several trunking options. Ameritech Illinois offers one-way or two-way trunks dedicated to the purpose of integrating the end offices and/or tandem offices of carriers for the completion of local switched and intraLATA toll traffic. However, as explained below, separate two-way trunks are necessary to carry interLATA toll, switched traffic, for which Ameritech Illinois proposes to use Toll Connecting Trunks (TCTs) to provide tandem-transported switched access services to IXCs.

- Q. Please explain how TCTs will be provisioned.

- A. TCTs will be provisioned to allow the CLEC's end users to connect to or be connected by any IXC connected to Ameritech Illinois' access tandem. TCTs will be a two-way, trunk-side connection between the Sprint or AT&T office and an Ameritech Illinois access tandem using appropriate

Feature Group D terminating signaling methodology. TCTs will be jointly engineered by Ameritech Illinois and the CLEC to carry the anticipated traffic to and from IXCs serving the specified area. These trunks will use the same trunk circuit equipment and same transmission and signaling functions used by Ameritech Illinois to connect to other LECs outside its exchanges and to connect its own end office and tandem switches.

Q. What is the pricing arrangement for TCT?

A. TCTs will be provided at no charge to the CLEC. Because of the limitations of the traffic recording systems, the connecting carrier and Ameritech Illinois must exchange billing tapes (as ILECs do today) so each company is properly compensated by the interexchange carriers for its portion of the traffic under meet point billing arrangements.

Q. How does Ameritech Illinois' proposed trunking architecture differ from what Sprint and AT&T are requesting?

A. These carriers propose combining all traffic types (e.g., local switched, intraLATA toll, interLATA toll) on one trunk group, whereas Ameritech Illinois' proposal does not permit the combining of interLATA traffic on the

same trunk group with local and intraLATA toll traffic. Ameritech Illinois' proposal is based on the fact that neither Ameritech Illinois nor the other carriers would be able to measure the volume of each type of traffic terminating on its network over a single trunk group, and would have to use percentage factors in lieu of actual measurements to create a bill.

Q. Why is a proposal to use percentage factors for such billing unacceptable?

A. If interLATA traffic were combined with local and intraLATA toll traffic on a single trunk, Ameritech Illinois would not be able to distinguish if a call was local, intraLATA, or interLATA. As a result, Ameritech Illinois could not bill actual usage of any traffic. Instead, all of its billing to Sprint or AT&T would be based on estimated usage data and traffic factors reported by these carriers. Such "Trust Me" billing is not a commercially reasonable arrangement for use by competing carriers in an increasingly competitive marketplace.

Accommodating the specialized billing arrangements that would be required due to the lack of accurate measurements would also require costly changes to both the billing systems for reciprocal compensation and the billing of IXC access charges. In addition, billing changes would

be required not only for Ameritech Illinois, but also for ILECs and CLECs that route long distance access calls through Ameritech Illinois' tandem.

Q. Do the proposals of Sprint and AT&T rely on percentage billing factors?

A. Yes they do. Their proposals rely upon percent local usage ("PLU") and percent interstate usage ("PIU") factors. In my view, this makes their proposal particularly undesirable. First, these factors are infrequently developed and updated, and are based on inexact, rough estimates of the split of minutes of use. Second, these factors require manual loading into multiple billing tables, thereby increasing the chance of human error. Third, if there are not restrictions on the traffic carried on a trunk group, a carrier could potentially violate local exchange routing guides, routing interexchange traffic over local trunk groups, for example, that should be routed over interexchange trunk groups.

Q. How does Ameritech Illinois' proposal permit the billing of various traffic types to be done accurately?

A. Ameritech Illinois' proposal for combined local and intraLATA toll traffic on a single trunk group allows each carrier to bill the originating carrier for the actual minutes of use at the actual rate for the type of call that was

made. Likewise, when an interLATA call is placed on the TCT trunks as described above, per Ameritech's proposal, each carrier can bill the other carrier for the actual minutes of use at the access rates. In contrast to Sprint's or AT&T's proposal, this arrangement allows Ameritech Illinois and Sprint or AT&T to receive the precise compensation that is due them for the routing any type of call.

C. Collocation

Q. MCI witness Marzullo complains that Ameritech Illinois refuses to permit the collocation of switching equipment which would enhance MCImetro network efficiencies. (Marzullo, pp. 12-13). Does Ameritech Illinois recognize any limitations on the types of equipment that may be collocated?

A. Yes. Following the federal Act, Rules, and First Report and Order, Ameritech Illinois only allows equipment to be collocated that is designed for and used for a proper collocation purpose under the Act, i.e., necessary for interconnection to Ameritech's network or for access to an unbundled network element. This policy is consistent with the FCC's Order, which "decline[d] to require incumbent LECs to allow collocation of any equipment without restriction. Section 251(c)(6) requires collocation

only of equipment 'necessary for interconnection or access to unbundled elements.'" (§ 581).

In addition, the FCC does not require collocation of equipment used to provide enhanced services or switching equipment. (Id.). Further, MCI's testimony that "placing switching equipment in MCImetro's collocated space "could give MCImetro significant efficiencies" – without specifying what they "could" be – while not placing any additional burden on Ameritech Illinois, is erroneous. (Marzullo, p. 14).

In effect, MCI wants Ameritech Illinois to become a lessor of space for a broader purpose than that prescribed by the FCC, while depleting space available for the prescribed purpose. Over and above the additional space required, if the switch were deemed to be required for interconnection or access to unbundled network elements, there would be significant infrastructure requirements associated with the placement of a switch, including batteries, rectifiers (converting AC to DC power), and possibly a generator. Because of these needs, and because central office space is not an unlimited commodity, Ameritech Illinois does not permit collocation of switches to take place.

Q. Has the issue of collocating switching equipment been addressed by the Commission?

A. As of the time this testimony is being prefled, the proposed decision in the AT&T arbitration recommends that AT&T not be permitted to collocate switching equipment in Ameritech Illinois' central offices. By the time this testimony is submitted into evidence, the Commission will have addressed this proposed decision. In addition, MCI has raised this issue in its arbitration with Ameritech Illinois.

Q. AT&T witness Falcone contends that Ameritech Illinois must permit the collocation of remote switch modules, ("RSM"), commenting that such equipment will perform very little switching. (Falcone, p. 9). Please respond.

A. As explained in the response to MCI's request that switching equipment be collocated, the FCC's rules do not require the collocation of switching equipment, irrespective of the amount of switching involved. The fact remains that the placement of the equipment is partly or wholly for purposes that are beyond those prescribed by the FCC. Ameritech Illinois, therefore, does not permit the collocation of such equipment in the form of RSMs or otherwise. Further, I would note that this issue is being

addressed by the FCC in the reconsideration proceeding, and will therefore be resolved by the FCC in its reconsideration order. Ameritech Illinois will comply with that order.

Q. Please comment on Mr. Falcone's claims that the inability of a CLEC to collocate RSMs in an Ameritech Illinois central office would adversely affect the incumbent LECs ability to perform remote testing of unbundled loops. (Falcone, p. 10).

A. Mr. Falcone's assertion is incorrect. Ameritech Illinois does not and cannot perform such tests today. Whether RSMs are collocated or not has absolutely no impact on the Company's central offices and their lack of access to unbundled loops for such testing.

Q. MCI witness Marzullo complains that Ameritech Illinois will not permit "virtual" collocators to interconnect in the same manner as physical collocators. She also complains that Ameritech Illinois insists on supplying the "interconnection wires" that connect one collocated space to another. (Marzullo, pp. 14-15). Please respond.

A. MCI has also raised this issue in its arbitration with Ameritech Illinois, where it will be resolved. The FCC's interconnection rules state that:

“an incumbent LEC shall permit a collocating telecommunications carrier to interconnect its network with that of another collocating telecommunications carrier at the incumbent LECs premises and to connect its collocated equipment to the collocated equipment of another telecommunications carrier within the same premises...”.

¶51.323(h). The rule goes on to specify that an incumbent LEC is not required to allow placement of connecting transmission facilities owned by competitors within the incumbent LEC premises anywhere “outside of the actual physical collocation space.”

In accordance with the rule, Ameritech Illinois properly provides the collocating carriers – whether virtually or physically collocated – the ability to interconnect utilizing connecting transmission facilities provided by Ameritech Illinois. However, in addition, Ameritech Illinois goes beyond the strict requirements of the rule and permits physically collocated carriers to place their own facilities between adjacent collocation areas.

- Q. Please respond to MCI witness Marzullo’s assertion that Ameritech Illinois is refusing to troubleshoot and maintain MCI collocated equipment. (Marzullo, p. 15).**

- A. It is difficult to respond to such blanket, vague allegations where no specific information is provided. I know of one situation, however, at the Lakeshore Central office in Chicago where Ameritech Illinois personnel, who had requested but not been given training from MCI on a particular piece of equipment, offered MCI personnel the opportunity to come on premises and direct any needed repairs. This offer was in accordance with the AVOIS tariff where the carrier/customer has elected to not provide training to Ameritech Illinois personnel in advance. In addition, our technicians suggested that the problem MCI was experiencing could be repaired by MCI remotely. In this particular instance, MCI was able to make the repairs remotely without sending a technician to our premises.

In all instances, Ameritech Illinois stands ready to receive any training which MCI elects to provide and to permit MCI personnel on to the premises to direct needed repairs to virtually collocated equipment. Alternatively, MCI can elect a physical in lieu of virtual collocation arrangement and perform any repairs directly using its own personnel.

Given these options and Ameritech Illinois' willingness to accept any training offered, I do not believe that Ms. Marzullo's vague assertions concerning maintenance issues have any validity.

E. Miscellaneous Interconnection Issues

Q. Sprint asserts that Ameritech Illinois has unreasonably required Sprint to interconnect using SONET with optical line terminating multiplex equipment ("OLTM"). (Reeves, p. 11). Please respond.

A. This is an example of another arbitration issue that is also being raised in this proceeding, where Sprint's witness, Michael Hunsucker, admitted that SONET is "the technology of choice." Nonetheless, Sprint would like to use Asynchronous equipment for interconnection instead of SONET technology with OLTM. However, Asynchronous equipment is an older technology that will eventually be replaced by OLTM equipment. To temporarily accommodate Sprint, Ameritech Illinois may be required to purchase equipment that will soon be replaced by OLTM equipment. Ameritech Illinois would then have to move the interconnection trunks to the OLTM equipment from the Asynchronous equipment. Essentially, this would require Ameritech to perform the work twice for moving facilities from OLTM equipment and then back again.

Because of the additional work, there is an increased potential for service interruptions due to having to eventually move trunks from the Asynchronous equipment to state-of-the-art, SONET equipment. The